

MDL 1570 PLAINTIFFS' EXECUTIVE COMMITTEES

In re: Terrorist Attacks on September 11, 2001 (S.D.N.Y)

Plaintiffs' Executive Committee for Personal Injury and Death Claims	Plaintiffs' Executive Committee for Commercial Claims
Ronald L. Motley (1944-2013) Jodi Westbrook Flowers / Donald A. Migliori, <i>Co-Chairs</i> MOTLEY RICE LLC James P. Kreindler, <i>Co-Chair</i> KREINDLER & KREINDLER LLP	Elliot R. Feldman, <i>Co-Chair</i> Sean Carter, <i>Co-Chair</i> COZEN O'CONNOR
Andrew J. Maloney III, <i>Co-Liaison Counsel</i> KREINDLER & KREINDLER LLP Robert T. Haefele, <i>Co-Liaison Counsel</i> MOTLEY RICE LLC	J. Scott Tarbutton, <i>Liaison Counsel</i> COZEN O'CONNOR

VIA ECF

July 6, 2017

The Honorable Sarah Netburn, U.S. Magistrate Judge
 United States District Court for the S.D.N.Y.
 Thurgood Marshall U.S. Courthouse, Room 430
 40 Foley Square
 New York, NY 10007

Re: *In Re: Terrorist Attacks on September 11, 2001, 03 MDL 1570 (GBD) (SN)*

Dear Judge Netburn:

We write to you on behalf of Plaintiffs' Executive Committees and Defendants' Executive Committee regarding the Court's July 7, 2017 deadline for the submission of a joint proposed deposition protocol.

On June 13, 2017, we reported that the parties had met and conferred at Clifford Chance's Washington D.C. office and made substantial progress toward a joint proposal. At that meeting, we agreed to circulate a revised proposal reflecting the progress that had been made and to continue to confer. Although a revised proposal was circulated late on Friday, June 30, due to the intervening holiday, coupled with corresponding vacation schedules this week, the parties have been unable to afford the revised proposal the consideration necessary to determine what disputes the parties can resolve themselves versus what we will ask for the Court to resolve.

To permit sufficient time to continue our dialogue and further narrow the issues, the parties jointly request that the Court's deadline to submit a joint proposal be extended to July 18, 2017. We appreciate the Court's indulgence while the parties continue to make productive progress.

We are grateful for the Court's attention to this matter.

The Honorable Sarah Netburn

July 6, 2017

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Respectfully,

/s/ Robert T. Haefele

ROBERT T. HAEEFELE

PLAINTIFFS' EXECUTIVE COMMITTEES

cc: The Honorable George B. Daniels, via ECF

All Counsel of Record via ECF